

Counsel for Mr. Young is extremely cognizant of the Court orders continuing this matter, and most especially of the Court's order dated September 8, 2011, ordering the trial date of June 4, 2012 to be a firm date (as well as the Court's order dated January 6, 2012 reaffirming that date). Counsel, however, respectfully asserts, based on the representations of prior counsel, co-defendants' counsel and the Assistant United States Attorney, the discovery is so voluminous and complex she does not believe she can be prepared to effectively represent Mr. Young in three months. Although clearly this delay will impact Mr. Young and the Government to some extent, any delay or prejudice is substantially outweighed by the necessity to provide Mr. Young with effective assistance of counsel.

Counsel for Mr. Young has discussed this motion with counsel for the Government, and there is no objection to continuing the motion deadline, as well as the trial date in this matter. Counsel for Mr. Young submits that the ends of justice served by granting this continuance outweigh the interest of Mr. Young and the public in a speedy trial. 18 U.S.C. §3161(h)(8)(A).

For all the above reasons, Counsel for Mr. Young requests that the above dates be continued.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on March 2, 2012, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

/s/ Hallie H. McFadden